

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

MARIE MCGONEGLE, individually and on behalf of those similarly situated,)	CASE NO: 1:23-cv-00199-DRC
	:	
Plaintiffs,)	Judge Cole
	:	
)	
v.	:	
)	
UNION INSTITUTE AND UNIVERSITY, et al.,	:	
)	
Defendants.	:	

**UNOPPOSED MOTION FOR ADDITIONAL EXTENSION OF TIME TO
RESPOND TO MOTION FOR COURT SUPERVISED NOTICE**

Pursuant to S.D. Ohio Civ. R. 7.3(a), the Defendants hereby move for an additional 14-day extension of time (to run through October 24, 2023) to respond to Plaintiff's Motion for Court Supervised Notice (Doc. 11). Plaintiff does not oppose this request.

As reported in Defendants' prior motion (Doc. 16) for further extension until October 10, 2023, to respond to the plaintiff's instant motion, the parties had entered into a settlement agreement at a mediation before Magistrate Judge Litkovitz held on August 18, 2023. Per the terms of that settlement agreement, a certain initial payment was to have been made by September 30, 2023. However, such payment was not timely made, although the parties have agreed that plaintiff will take no action either to enforce and terminate the settlement agreement if the Union Institute and University pays the amount that was due by September 30, 2023, by Friday, October 13, 2023. Should that payment not be timely made, plaintiff is reserving all rights. For the foregoing reason, Defendants respectfully request that they be granted an addition extension of time to respond to plaintiff's said motion. A proposed order is submitted herewith.

Respectfully submitted,

BRICKER GRAYDON LLP

/s/ John B. Pinney

Michael A. Roberts (#0047129)

John B. Pinney (#0018173)

BRICKER GRAYDON LLP

312 Walnut Street, Suite 1800

Cincinnati, OH 45202

(513) 629-2799

Fax: (513) 651-3836

mroberts@brickergraydon.com

jpinney@brickergraydon.com

Attorneys for Defendants